

IN THE DISTRICT COURT OF THE UNITED STATES

For the Western District of New York

**March 2008 Grand Jury
(Empaneled March 27, 2008)**

The United States of America

INDICTMENT

-VS-

Violations:

21 U.S.C. §§ 856(a)(1), 846
and 841(a)(1);

18 U.S.C. §§ 924(c)(1) and 2

**JON LUCAS
LAMAR RICHARDSON**

COUNT I

The Grand Jury Charges:

On or about the 23rd day of July 2008, in the Western District of New York, the defendants, **JON LUCAS** and **LAMAR RICHARDSON**, did knowingly, willfully and unlawfully combine, conspire and agree with others, known and unknown to the Grand Jury, to commit offenses against the United States, that is, to possess with intent to distribute, and to distribute, a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code,

Sections 841(a)(1) and 841(b)(1)(C), and to use and maintain premises for the purpose of manufacturing, distributing and using cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 856(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT II

The Grand Jury Further Charges:

On or about the 23rd day of July 2008, in the Western District of New York, the defendants, **JON LUCAS** and **LAMAR RICHARDSON**, did knowingly, intentionally and unlawfully possess with intent to distribute a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT III

The Grand Jury Further Charges:

On or about the 23rd day of July 2008, in the Western District of New York, the defendants, **JON LUCAS** and **LAMAR RICHARDSON**, did knowingly, intentionally and unlawfully use and maintain the premises at 1955 East Main Street, Apartment 1, Rochester, New York, for the purpose of manufacturing, distributing and using

cocaine base, a Schedule II controlled substance, and marijuana, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 856(a)(1) and Title 18, United States Code, Section 2.

COUNT IV

The Grand Jury Further Charges:

On or about the 23rd day of July 2008, in the Western District of New York, the defendants, **JON LUCAS** and **LAMAR RICHARDSON**, in furtherance of drug trafficking crimes for which they may be prosecuted in a court of the United States, that is, violations of Title 21, United States Code, Sections 841(a)(1), 846 and 856(a)(1), as set forth in Counts I, II and III of this Indictment, the allegations of which are incorporated herein by reference, did knowingly and unlawfully possess and brandish a firearm, namely, one (1) Winchester, model 1200, 12 gauge shotgun, bearing serial number L745737, and during and in relation to said drug trafficking crimes, did knowingly and unlawfully use and brandish said firearm.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

COUNT V

The Grand Jury Further Charges:

Forfeiture Allegation

Upon conviction of the offenses alleged in Counts I, II, III or IV of this Indictment, the defendants, **JON LUCAS** and **LAMAR RICHARDSON**, shall forfeit to the United States, all of their right, title and interest in any firearm and ammunition involved or used in the commission of the offense, or found in the possession or under the immediate control of the defendants at the time of arrest including, but not limited to:

- a) one (1) Winchester, model 1200, 12 gauge shotgun, bearing serial number L745737; and
- b) ammunition, namely thirteen (13) 12 gauge rounds.

All pursuant to the provisions of Title 18, United States Code, Sections 924(d) and 3665 and Title 28, United States Code, Section 2461(c).

DATED: Rochester, New York, December 17, 2008.

TERRANCE P. FLYNN
United States Attorney

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A TRUE BILL:

S/FOREPERSON
FOREPERSON